

Exhibit E



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September 11, 2023

VIA EMAIL

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Dear Gabe:

We are in receipt of your email memorializing certain issues we discussed during our meet and confer last Friday, September 8th. In response, we are providing the following information and comments, as well as following up with our own questions concerning outstanding items. We felt that good progress was made on numerous fronts on Friday, and hope we can resolve these issues without involving the Court.

1. Servicios Funerarios's Search Protocol

For all Gayosso email and central repository data that pre-date the sale to SF, we have run all proposed search terms despite many of them being overbroad. We have used sampling and filtering to avoid a full review of the universe.

For all Gayosso email and central repository data that post-date the sale to SF, as well as all MexCap email and central repository data, the attached schedules indicate which terms we agree to run without amendment, which terms we agree to run with certain limitations, and which terms we intend to exclude absent an acceptable proposal from AIC. We also intend to apply these terms to the cell phone data for Pablo Peña Vazquez, Carlos Peña Vazquez, and Mariana Gonzalez, and the individual custodian data collected as a result of interview responses.

In addition to this review, we have agreed to search for and produce documents responsive to RFPs 1-2, 8, 16-20, 28, 30-31, 54, 84-85, 87, and 90 through traditional methods, including interviewing individuals most likely to know where those documents reside and linear review of the central repositories, as appropriate.

2. Custodians

We are working with our client to rank the requested custodians and will revert as soon as we are able to do so. To be clear, we believe that our reduced list of custodians should be acceptable to AIC. Nevertheless, in an attempt to resolve this issue, we will list custodians on a priority basis, without our doing so being a waiver of our request and with the understanding that our attempt to resolve this issue will not be used by AIC if we require intervention by the Court.



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3. Advent's Exclusion of Terms

We have no objection to your excluding Advent, AIC, Paz, Pani, Peña, and Westra as standalone search terms. While we have not seen hit reports for most of these terms, we understand that they are likely to generate very high hit rates, especially once additional custodians are included.

4. Revised Date Range

While we cannot agree with your unilateral decision to truncate the production period by more than two years, we are amenable to the use of a more limited set of search terms targeted at only those topics which may be relevant from March 31, 2021 through May 5, 2023. We anticipate providing that list by Wednesday, September 13th.

5. Reconsideration of Position on Issues in Motion to Compel

Earlier today, we filed our response in opposition to your motion to compel. We believe that motion clarifies our positions and, should you wish to discuss any of those topics in light of our argument, we are always available to meet and confer.

6. Chagoya Documents

We are working with the client on this and will revert as soon as we are able to do so. However, because Mr. Chagoya is not controlled by Servicios Funerarios, we cannot be responsible for his production of documents.

7. Servicios Funerarios' Production Completion

We are, as your correspondence notes, conducting rolling productions. We anticipate completing the Gayosso pre-transaction production within the next 7 to 10 days.

Because all future rolling productions will likely contain a mix of MexCap and Gayosso documents, we cannot provide a firm date by which we will make a first "MexCap" production although we can confirm that tens of thousands of MexCap documents are in review queues at this time.

8. El-Mann Family Production

We have agreed to provide all documents in our clients' possession which relate to the El-Mann family and Gayosso. As we explained on the call, we do not intend to exclude any documents falling into this category. If you do not believe the search terms that you proposed will adequately capture these documents, please advise how you would propose to proceed.



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9. AIC's Non-Collection of Cell Phone Data

We believe it is appropriate for AIC to collect cell data from a limited number of custodians. Please advise whether you would be amenable to collecting such data for a limited number of custodians and we will provide a list.

We will address the outstanding items in your email by separate letters in the coming days.

Very truly yours,

/s/ Carlos M. Sires

Carlos M. Sires

SCHEDULE A

Search Terms Servicios Funerarios Agrees to Run

<u>Search Term</u>
"Anexo 15"
"arrest warrant"
"Banco Ve Por Más"
"comité de auditoría"
"comité de finanzas"
"cuarto de datos"
"demand letter" OR "carta de demanda" OR "carta de requerimiento"
"doble factura"
"Ernst & Young"
"ficha roja"
"Flash Report"
"García González y Barradas"
"Grupo E"
"Grupo Financiero Ve Por Más"
"Guerra Gonzalez"
"irregularidades contables"
"José Alfredo Chávez Carrera" OR "José Chávez"
"Junta Directiva"
"Luis Ignacio Hernández Vivar" Or "Luis Hernández"
"Marco Antonio Ramos Rivera" OR "Marco Ramos"
"notificación roja"
"orden de detención"
"pasivos no reconocidos" OR "unrecognized liabilities"
"pasivos no revelados" OR "undisclosed liabilities"
"red notice"
"SA Institución de Banca Múltiple"
"Transaction Advisory Services and Valuation"
"Transaction Services"
"Trust Fideicomiso 666" OR (Trust w/5 666) OR (Fideicomiso w/5 666)
("cuentas por pagar" w/25 factura)
("situación real" w/5 empresa)
("Pre-necesidad" OR "Pre-anticipación" OR "pre-need") w/25 (difícil OR problemas))
((barda* w/3 perimetrale*) OR cerca OR fence) w/25 ("Valle de la Luz" OR "El Cobano" OR "San Ignacio" OR "Jardines Eternos" OR "Jardines del tiempo" OR "Jardines de León I" OR "Jardines de León" OR Morelia OR "Jardines del Descanso" OR "Jardines del Parque" OR

"Jardines del Carmen" OR Español OR Guadalupano OR "Parque Memorial" OR Cipreses))
((borr* OR elimin* OR destrui* OR quita* Or retir* OR suprim* OR anul* OR deshac* OR ocult*) w/20 SAP)
((obligacion* w/2 contractual*) AND (no w/2 (incluir OR relevar OR prever)))
(CAPEX w/10 ("no realizado" OR "no registrado"))
(Memorial w/5 (proyecto OR deal OR propiedad OR project OR portafolio OR portfolio))
(obligacion* w/2 contractual*) w/10 ("no registradas" OR omit* OR desaparecido OR subval* OR omisión)
(pasivo* AND (contrat* w/10 (falta* OR desaparecido* OR falso* OR incorrect* OR incomplet*)))
*@adventinternational.com
*@adventinternational.mx
*@ggyb.mx
*@sarur.com
AIC
aprehensión OR aprehension
Arregoytia
arresto
carpeta w/5 penal
congela*
criminal
detención OR detencion
estafa
GGB
Hicks
inmobilizacion
Interpol
InverCap
Julio w/2 Scherer
Jupiter
medidas precautorias
Pani
prision preventiva
SFGG
Somar
TWIBEL
Viakem
Westra

SCHEDULE B

Search Terms Servicios Funerarios Agrees to Run Only on Gayosso Collections

<u>Search Term</u>	<u>File Count</u>
"due diligence"	13551
"E&Y"	5224
"El-Mann"	8058
"Fibra Uno"	28294
"mala fe"	5780
CPPIB	11956
denuncia	6119
diligencia	4723
KYC	3561
NIIF	4213
VDR	3527

SCHEDULE C

Search Terms Servicios Funerarios Agress to Run Only on MexCap Collections

<u>Search Term</u>	<u>File Count</u>
"Instituto de Seguridad y Servicios Sociales de los Trabajadores del Estado" OR "ISSSTE" OR "ISSTE"	14631
Gaxiola	7708
Sainz	13504
SAP	3855

SCHEDULE D

Search Terms to Be Run with Proposed Limiter

<u>Search Term</u>	<u>File Count</u>	<u>Proposed Limiter</u>
"precio de compra"	3213	AND Gayosso
Paz	7420	Carlos w/3 paz
préstamo OR prestamo	8188	AND Gayosso

SCHEDULE E

Search Terms Servicios Funerarios Plans to Exclude in the Absence of a Reasonable Proposal to Limit Hits

<u>Search Term</u>	<u>File Count</u>
"Comité Directivos" OR "Comités Directivos" OR "Miembros del Consejo" OR "Consejeros" OR "Junta de Consejo"	24260
"data room"	20894
"EY"	63304
"Servicios Funerarios"	33671
"SPA"	9154
((cementerio* OR mausoleo* OR Morelia OR "Arcangel Miguel" OR Rotonda OR Mexicali OR Guadalajara OR Sullivan) w/10 (constru* OR restaur* OR modifc* OR implanta* OR acondicionamient* OR provision*))	19016
((gasto* OR costo*) w/50 construcción* OR infraestructura*)	17190
((pasivo* OR costo* OR gasto*) w/50 (constru* OR tumba* OR mausole* OR ataúd* OR infraestructura*))	35777
(accionista* AND (nota* OR resolución* OR aprobación* OR presentación* OR documento* OR correspondencia*))	24227
(factura* w/20 (borr* OR elimin* OR destrui* OR quita* Or retir*OR suprim* OR anul* OR deshac* OR ocult* OR omit* OR parci*))	7861
(politica* w/3 contable*) OR (informe* financiero*) OR (metodologia* w/3 contable*) OR (anális* w/3 contable*) OR (anális* w/3 financiero*) OR (estado* w/3 contable*) OR auditor* OR "libro de contabilidad" OR (informe* w/3 interno*) OR (informe w/3 externo*)	61510
(presupuesto w/10 (2018 OR 2019 OR 2020 OR 2021))	16029
Advent	29386
Andre	7776
aseguramiento	4254
audit*	70895
Barradas	4592
bote	3874
Castillo	63598

cautela*	2979
Chagoya	40494
chino	4893
Civil	53967
Consultoria	7496
CXC	6207
CXP	2747
DD	19591
dolo	6079
embargo* OR bloqueo	72477
estado* w/5 financiero*	33111
ExeFin	23254
fiscal OR "ministerio publico"	144227
fraud* OR "defraud* OR enga�n*	11203
FUNO	43092
Gayosso	25570
Guarantee OR garantia	20687
HSBC	54456
IFRS	16852
ingreso* OR revenue OR gasto* OR costo* OR provision OR reserva*	361723
inversi�n	36603
investigaci�n* OR investigation	14222
lawsuit OR demanda OR litigio OR queja OR amparo OR reclaim* OR claim OR litigation	68925
Mancera	31111
mercantil	26780
MexCap	34266
Mifel	8340
Penal	8411
reconocimiento w/5 ingreso* OR costo* OR gasto*	5494
SAT	170787
SF	48582
Trejo	9739
valor*	192130
valuaci�n* OR precio OR (valor w/5 accion*)	120192